

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
UPS WITNESS SAPPINGTON  
(USPS/UPS-T6-39-40)

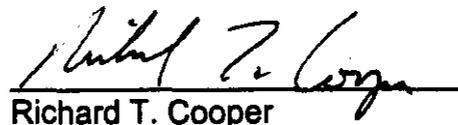
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to UPS witness Sappington: USPS/UPS-T6-39-40.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2993 Fax -5402  
June 16, 2000

**USPS/UPS-T6-39. Refer to Table 6 of your testimony at page 36. Please provide appropriate citations and all calculations and data inputs used to calculate "Average Annual % Change in Real Attributed Cost per Piece."**

**USPS/UPS-T6-40. Refer to Docket No. R97-1, PRC Lib Ref - 12 at page 22.**

- a. Confirm that the Postal Rate Commission's estimated Priority Mail volume in the Test Year After Rates are reduced by 107,352 (000) pieces as a result of the recommended classification change increasing the maximum weight for First-Class Mail from 11 ounces to 13 ounces. If not confirmed, please explain fully.**
- b. Confirm that the Postal Rate Commission's estimated Priority Mail costs in the Test Year After Rates are reduced by \$190,238.7 (000) as a result of the recommended classification change increasing the maximum weight for First-Class Mail from 11 ounces to 13 ounces. If not confirmed, please explain fully.**
- c. Confirm that the Postal Rate Commission's estimated Priority Mail revenues in the Test Year After Rates are reduced by \$343,526.4 (000) as a result of the recommended classification change increasing the maximum weight for First-Class Mail from 11 ounces to 13 ounces. If not confirmed, please explain fully.**
- d. Do you agree that the change in Priority Mail cost per piece in your Table 6 from the Docket No. R94-1 test year to the Docket No. R97-1 test year, in part, reflects the PRC Docket No. R97-1 recommended change in the maximum weight for First-Class Mail from 11 ounces to 13 ounces? If not, please explain fully.**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Richard T. Cooper

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